

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

<p>MARK ANTHONY ORTEGA, Plaintiff, v.</p>	<p>§ § § § § § § §</p>	<p>Case No. 5:24-cv-00838-FB</p>
		LOUIS AMBROSIO AND BLOCK EQUITY GROUP, LLC
		Defendants.

PROPOSED SCHEDULING ORDER

The disposition of this case will be controlled by the following schedule:

1. The parties shall complete ADR in compliance with Local Rule CV-88, by May 30, 2025. A motion objecting to ADR must be filed no later than March 31, 2025 (at least 60 days before that deadline).
2. The parties asserting claims for relief shall submit a written offer of settlement to opposing parties by February 15, 2025, and each opposing party shall respond, in writing, by March 1, 2025.
3. The parties shall file all motions to amend or supplement pleadings or to join additional parties by March 31, 2025.
4. All parties asserting claims for relief shall file their designation of testifying experts and shall serve on all parties, but not file, the materials required by Fed. R. Civ. P. 26 by July 31, 2025. Parties resisting claims for relief shall file their designation of testifying experts and shall serve on all parties, but not file, the materials required by Fed. R. Civ. P. 26 by August 28, 2025. All designations of rebuttal experts shall be designated within 14 days of receipt of the report of the opposing expert.
5. An objection to the reliability of an expert's proposed testimony under Federal Rule of Evidence 702 shall be made by motion, specifically stating the basis for the objection and identifying the objectionable testimony, within 30 days of receipt of the written report of the expert's proposed testimony, or within 30 days of the expert's deposition, if a deposition is taken, whichever is later.
6. The parties shall complete all discovery on or before October 31, 2025. Counsel may by agreement continue discovery beyond the deadline, but there will be no intervention by

the Court except in extraordinary circumstances, and no trial setting will be vacated because of information obtained in post-deadline discovery.

7. All dispositive motions shall be filed no later than **December 5, 2025**. Dispositive motions and responses to dispositive motions shall be limited to 20 pages in length in accordance with Local Rule CV-7. Replies, if any, shall be limited to 10 pages in length.

8. The trial date will be determined at a later date by the Court. The parties shall consult Local Rule CV-16 regarding matters to be filed in advance of trial. At the time the trial date is set, the Court will also set the deadline for the filing of matters in advance of trial.

Respectfully submitted,

Plaintiff:

/s/ Mark Ortega (with permission)

Mark Ortega, Plaintiff *pro se*

-AND-

MUNSCH HARDT KOPF & HARR, P.C.

By: /s/ Michael A. Harvey

MICHAEL A. HARVEY

State Bar No. 24058352

Federal ID No. 917759

700 Milam Street, Suite 800

Houston, Texas 77002

Telephone: (713) 222-4015

Facsimile: (713) 222-5834

mharvey@munsch.com

ATTORNEYS FOR DEFENDANTS

OF COUNSEL:

Earl L. Ingle

State Bar No. 24097234

Sofia Colorado

State Bar No. 24121545

MUNSCH HARDT KOPF & HARR, P.C.

700 Milam Street, Suite 800

Houston, Texas 77002

Phone: (713) 222-4075

Fax: (713) 222-5834

eingle@munsch.com

scolorado@munsch.com

CERTIFICATE OF SERVICE

Pursuant to Rule 5 of the Federal Rules of Civil Procedure, the undersigned counsel for the Defendants certify that the foregoing document has been filed with the Court electronic case filing system and served upon all known parties by e-service, first class mail, facsimile and/or certified mail, return receipt requested on December 11, 2024.

Mark Anthony Ortega, *Pro Se*
P.O. Box 702099
San Antonio, Texas 78270

/s/ Michael A. Harvey
Michael A. Harvey